

# TERRENI

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February 15, 2021

The Honorable Jocelyn G. Boyd  
Chief Clerk and Executive Director  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

Re: Docket No. 2020-247-A. Public Service Commission Review of South Carolina  
Code of Regulations Chapter 103 Pursuant to S.C. Code Ann. Section 1-23-120(J)

Dear Ms. Boyd:

I write on behalf of South Carolina Water Utilities, Inc., South Carolina Water Utilities-CUC, Inc. Palmetto Utilities, Inc., Palmetto Wastewater Reclamation, LLC, Kiawah Island Utility, Inc., T.J. Barnwell Utility Co., and Harbor Island Utilities, Inc. (“the SouthWest Water utilities”) to comment on two proposals of the Consumer Advocate filed in the above-referenced docket on February 9, 2021.

The Consumer Advocate proposed utilities file direct testimony with an application to give interested parties more time for review and allow more time for the hearing, proposed orders, and preparation of the final order. We believe it is better to conclude the intervention process before the applicant’s direct testimony is filed. A utility can better identify and testify to the salient issues after third parties have intervened and stated their concerns. Direct testimony filed with the application would be more general and less useful to the Commission. Perhaps the Consumer Advocate’s concerns could be better addressed by moving up the schedule for prefiled testimony; however, the ORS must have sufficient time to complete its audit before it files testimony.

We also disagree with the Consumer Advocate’s proposal that a utility “submit ....all supporting documents, including studies, models, workpapers, spreadsheets, tables, formulas, and data that support its request” with its application. The requested documentation is very broad and appears to cover internal confidential documents. If the proposal is meant only to include information “relied on to support [the utility’s] application”, as the Consumer Advocate later states, it would still pose significant logistical obstacles. Much of this information would be confidential or proprietary and could not be publicly filed, nor could DMS accept the many formats in which it is compiled. The Consumer Advocate and other parties can more efficiently obtain this information through early discovery requests, which a utility can answer with appropriate safeguards.

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Thank you for the opportunity to participate in this workshop.

With best wishes, I am,

Sincerely yours,

*s/ Charlie Terreni*

Charles L.A. Terreni

c: Counsel of Record